

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

JAWWAD FREEMAN,

Defendant

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M.B.D. Case No. 20-mc-91326

**MOTION FOR ENDS-OF-JUSTICE CONTINUANCE OF TIME
FOR FILING AN INDICTMENT OR INFORMATION, AND
EXCLUSION OF TIME, UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through Assistant United States Attorney Michael Crowley, with the agreement of counsel for Defendant Jawwad Freeman, respectfully moves this Court to grant a continuance of the time within which an indictment or information must be filed, and exclude the time period from July 16, 2020, through and including September 19, 2020, from the speedy trial clock, pursuant to the Speedy Trial Act, 18 U.S.C. §§3161(h)(7)(A), and Sections 5(b)(7)(B) and 5(c)(1)(A) of the *Plan for Prompt Disposition of Criminal Cases* for the United States District Court for the District of Massachusetts (effective December 2008), on the ground that the ends of justice served by granting the requested continuance and excluding these periods outweigh the best interests of the public and the defendant in a speedy trial. The parties further ask this Court to issue the attached proposed *Order of Continuance and Excludable Delay*. In support of this request, the parties state as follows:

1. Defendant was charged by a complaint; the case was initiated against Defendant by a criminal complaint in *United States v. Jawwad Freeman*, Case No. 20-MJ-06385-MPK. Per Order of the District Court, the grand jury for this case has been postponed through the end of August 2020 due to the present health crisis. The government is preparing initial discovery regarding the case

(which is primarily materials related to the execution of a state search warrant), and will provide the initial discovery to counsel for Defendant.

2. The requested exclusion of time will permit defense counsel to adequately confer with Defendant, and allow the government sufficient time to produce initial discovery. This discovery will allow Defendant to prepare for trial, as well as to review a potential resolution of the case. Such a pre-indictment resolution may benefit Defendant. The parties agree that, if the requested time is excluded, the government has until September 19, 2020 to return an indictment in this case. A proposed order is attached.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Michael J. Crowley
Michael J. Crowley
Assistant U.S. Attorney

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

By: /s/ Michael J. Crowley
Michael J. Crowley
Assistant U.S. Attorney

Date: July 13, 2020